

To; FCC Commissioners  
Washington, DC

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1998 Biennial Regulatory

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350 1209

Review admt., part 97 of the  
Commission's Amateur Service  
rules FCC WT docket 98-143

Dear Commissioners,

I Hold a General Class Lic. And have been a Amateur  
radio Op. since 1957

Here is my comments on Lic. re-structuring. Have (3) three classes of  
Licensing (Which is the goal of the FCC) and they are.

A- Extra @ 20 wpm code proficiency, @one minute solid copy.  
B- General@ 13 " " " " " "  
C- Technician@ 5 " " " " " "

ORIGINAL

We don't need the Novice, Tech plus, or the Advanced classes. Either meld the  
Advanced with the Extras, Or the Generals in with the Advanced  
In the 60's the Extra and Advanced were generated as a Incentive classes. I see  
the Advanced class as a overlap of the general class and as a unnecessary class  
license. I also agree that the Tech and novice class can overlap of each other.

So to reach a 3 tier class system, I recommend the above suggestion.

On the Morse code! It took me awhile to learn the code, now I do 15 to 20  
comfortably. Its a form of discipline, Which is needed within the Amateur  
Community. And as far as the written requirements, I believe in what the FCC sets  
as the standard of electronic knowledge, needed

As for the "Power" restrictions, with the advent of Lic. restructuring, The Tech  
class, if they get HF Privileges, should be limited to 100 watts cw only, and in the  
same operating frequencies as the novices now have. And with the generals and  
higher, the standard 1500 watts output. (I remember being rock bound and 50 watts  
and I was happy to have that )

As for Disability waivers/ Definitely needs some improvement. There has to be, two  
doctor certificates to indicate the candidate for a lic. waiver. And I recommend each  
state have a 5 member panel to do the testing. The 5 member panel is unknown to  
the lic. candidate, with maybe two alternates, A minimum of three test panel  
members is needed to pass the test and waive the operation.

I believe in the (3) member panel VE testing setup therefore I would be against the  
Advanced class giving tests . PLEASE keep the 5 member test setup, I just think  
the door would be opened to more abuse, of testing .

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On ENFORCEMENT, While there is a need for enforcement, I'm not aware of the ARRL thinking, We have OO's(Offical Observers) 'They should be given some authority to warn in the name of the FCC(With some training on this matter, and Certified) and have a system of "How many citations for infractions, could be initiated, ie [all OO's, E-mail monthly reports to the FCC and the ARRL on given citations mailed out, and be regeristed mail to the &fenders]. When a known amount of citations FCC number) is noted on a individual, then a show cause,or hearing, before a volunteer STATE panel of (3) OO's is required, before entering INTO A FCC hearing. (ITS A SORT OF A MEDIATION PANEL, TO GIVE A OFFENDING VIOLATOR A CHANCE TO AMEND THERE WAYS.before going to court.

I'm in agreement with "POWER" in the RF exposure table, with PEP input to antenna.

Also in agreement with, No one holding a FCC ticket may apply for a Reciprocal permit for a alien amateur license.

Also in agreement to phase out RACES station license

All in all, If 3 licenses structure is the GOAL... go with A-Extra, B-general,C-Tech.  
20wpm 13 w p m 5wpm

Thanks for giving me the chance to address the commission,Which the ARRL didn't do for me.

Sincerely yours,

John J. Keating. WA2FYL

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